

Applicant respectfully traverses the rejection of claims 1, 3, 4 and 6-39 under 35 U.S.C. 103(a) as being unpatentable over Sugiyama et al. in view of Toko.

Independent claims 1, 8, 14 and 29, as amended, disclose first and second substrates and “a reflective electrode over the first substrate, said reflective electrode having an opaque metal and begin a surface with convex portions”. Applicant submits that the changes incorporated in the amendment of claims 1, 8, 14 and 29 is supported by the Specification.

The rejection of claims 1, 8, 14 and 29 should be withdrawn because Sugiyama et al. fails to disclose a reflective electrode (over a substrate) having an opaque metal and being a surface with convex portions” as recited in the claims. By contrast, Sugiyama et al. discloses line shaped electrodes formed on two glass substrates (col. 3, lines 60-61). Sugiyama et al. does not indicate or suggest that any of the electrodes is a ‘a surface with convex portions”. Further, Sugiyama et al. also fails to indicate or suggest that the electrodes have an opaque metal. By contrast, Sugiyama et al. discloses transparent electrodes (see col.4, line5P. Because the line-shaped, transparent electrodes of Sugiyama et al. clearly differ from the reflective electrode “having an opaque metal and being a surface with convex portions” recited in claims 1, 8, 14 and 29, Sugiyama et al. fails to teach or suggest the present invention.

Applicant submits that Toko fails to cure the deficiencies of Sugiyama et al. because Toko also fails to disclose a reflective electrode ‘having an opaque metal and being a surface with convex portions”. Toko is silent with respect to the shape, composition and translucence (or lack thereof) of the disclosed electrodes. Therefore, Toko also fails to teach or suggest the present invention as defined in claims 1, 8, 14 and 29.

For the foregoing reasons, claims 1, 8, 14 and 29 are not rendered obvious by the combination of Sugiyama et al. and Toko, and therefore should not be allowed. Consequently, claims, 3-4 and 6-7, 9-13, 15-28, and 30-39 as being dependent upon claims 1, 8, 14 and 29 respectively, should also be allowed.

In view of the foregoing amendments and remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 50-0911.

Respectfully submitted,

LONG ALDRIDGE & NORMAN, LLP

A handwritten signature in black ink, appearing to read 'Song K. Jung', is written over a horizontal line.

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